

## REMARKS

### *Status of the Claims*

Claims 8-11 are pending in this application, with Claim 8 being the sole independent claim. Claim 12 has been canceled without prejudice to or disclaimer of the subject matter recited therein.

### *Requested Action*

Applicant respectfully requests the Examiner to reconsider and withdraw the outstanding objection and rejections in view of the foregoing amendments and the following remarks.

### *Claim Objection*

Claim 12 was objected to as having an improper dependent form. Because this claim has been canceled, the objection is rendered moot.

### *Claim Rejections*

Claims 8-10 and 12 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,404,981 to Kumagai et al. Claim 11 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Kumagai et al. in view of U.S. Patent Publication No. 2005/0088527 to Silverbrook.

*Response to Claim Rejections*

Applicant respectfully traverses the rejections for the following reasons.

Independent claim 8 relates to an image pickup apparatus that includes a lens barrel, an image pickup device, an image display unit, an exterior member, and a chassis. The exterior member comprises front and rear covers each extending from a first side to a second side of the apparatus. The chassis is disposed at least between the lens barrel and the image display unit and extends from the first side to the second side of the apparatus. The chassis comprises first bent portions and a second bent portion. The first bent portions are positioned at opposing ends of the chassis. The first bent portions are also fixed to the front and rear covers of the exterior member by a plurality of fixing members formed on the first bent portions in order to fix the chassis to the exterior member. The second bent portion is formed between the first bent portions in an area other than an area between the lens barrel and the image display unit.

Thus, one non-limiting example shown in Figure 2 illustrates a chassis 11 having bent portions 11a and 11b at opposing ends thereof and bent portion 11d disposed around the SD card slot housing 7, which is in an area other than between the barrel 13 and the liquid crystal panel 15. The bent portions 11a and 11b are both fixed to the front cover 8 and the rear cover 9 using screws (page 9, line 26 through page 10, line 1).

By fixing the first bent portions of the chassis to the front and rear covers of the exterior member by a plurality of fixing members, the strength of the apparatus is increased, improving resistance against deflection of the central portion of the apparatus when the sides of the apparatus are stressed. In addition, by positioning the second bent portion in an area other than between the lens barrel and the image display unit, the

strength of the apparatus can be improved without increasing the thickness of the apparatus. Thus, this arrangement improves the strength of the apparatus without increasing its thickness.

In contrast, the citation to Kumagai et al. is not understood to disclose or suggest first bent portions of a chassis positioned at opposing ends of the chassis and fixed to the front and rear covers of an exterior member by a plurality of fixing members formed on the first bent portions, as recited by Claim 8. Therefore, this patent is not understood to disclose or suggest a second bent portion of the chassis formed between such first bent portions, as also recited by Claim 8. As a result, this patent is further not understood to disclose or suggest a second bent portion formed between such first bent portions and in an area between a lens barrel and an image display unit, as also recited by amended Claim 8.

Rather, the citation to Kumagai et al. is understood to merely disclose that the front side half 2a of a casing 2, (which the Office Action considers the claimed front cover) is attached to an extended portion of an upper flange 42b (which the Office Action considers one of the claimed first bent portions) by screws 44, as discussed at column 5, lines 48-51. The element the Office Action considers to be the other first bent portion — lower flange 42c — is understood to be attached to the floppy disc drive 32 via screws 51 and 52, as discussed at column 6, lines 5-15 and as shown in Figure 5. Applicant submits that neither the specification, nor the drawings of the Kumagai et al. citation show that the lower flange 42c is fixed to the rear side half 2b of the casing 2, which the Office Action considers to be the claimed rear cover, by a plurality a fixing members. Consequently, the citation to Kumagai et al. is not understood to disclose or suggest fixing plural first bent portions of a

chassis to front and rear covers of an exterior member by a plurality of fixing members, as recited by Claim 8.

Since Claim 8 recites at least one feature not understood to be disclosed or suggested by the citation to Kumagai et al., Applicant submits that the Office has not satisfied its burden of proof to establish the anticipation of Claim 8 over this citation. Therefore, Applicant respectfully requests that the rejection of Claim 8 be withdrawn.

The remaining claims are either directly or indirectly dependent on Claim 8. Thus, each of these claims are patentable by virtue of their dependency on a patentable claim. These claims also are patentable due to the additional features they recite. Individual reconsideration of the dependent claims is respectfully solicited.

### *Conclusion*

In view of the above amendments and remarks, the application is now in allowable form. Therefore, early passage to issue is respectfully solicited.

Any fee required in connection with this paper should be charged to Deposit Account No. 06-1205.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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